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15 UNITED STATES BANKRUPTCY COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION
17

18 In re
19 THE ROMAN CATHOLIC ARCHBISHOP
20 OF SAN FRANCISCO,

21 Debtor and
22 Debtor in Possession.

Case No. 23-30564

Chapter 11

**NOTICE OF HEARING ON DEBTOR'S
MOTION FOR EXTENSION OF
DEADLINE FOR REMOVAL OF CIVIL
ACTIONS [28 U.S.C. § 1452 AND
BANKRUPTCY RULE 9027]**

23 Date: October 26, 2023
24 Time: 1:30 p.m.
Location: Via ZoomGov
25 Judge: Hon. Dennis Montali

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Case No. 23-30564

1 **NOTICE IS HEREBY GIVEN** that The Roman Catholic Archbishop of San Francisco,
2 debtor and debtor-in-possession herein (“Debtor”), has filed a *Motion for Extension of Deadline for*
3 *Removal of Civil Actions* (the “Motion”) and that a hearing on the Motion is scheduled before the
4 Honorable Dennis Montali on October 26, 2023, at 1:30 p.m. at the United States Bankruptcy Court,
5 Northern District of California, San Francisco Division, before the Honorable Dennis Montali (the
6 “Hearing”). The Hearing will not be conducted in the presiding judge’s courtroom but instead will
7 be conducted by videoconference via ZoomGov. The Bankruptcy Court’s website provides
8 information regarding how to arrange an appearance at a video or telephonic hearing. If you have
9 questions about how to participate in a video or telephonic hearing, you may contact the court by
10 calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy Court’s website. The
11 link to the judge’s electronic calendar is: <https://www.canb.uscourts.gov/judge/montali/calendar>.

12 **NOTICE IS FURTHER GIVEN** that the Motion is supported by the *Declaration of*
13 *Joseph J. Passarello in Support of Chapter 11 Petition and Debtor’s Emergency Motions* [Dkt 14],
14 the *Declaration of Paul E. Gaspari in Support of Chapter 11 Petition and Debtor’s Emergency*
15 *Motions* [Dkt 15], and the *Declaration of Joseph J. Passarello* in support of this motion, the
16 pleadings and papers on file in this case, and such other evidence and argument as may be
17 submitted before or during the hearing on the Motion.

18 As noted in the Gaspari Decl. and Passarello Background Decl., the Debtor is informed and
19 believes that approximately 537 complaints have been filed in the Joint Coordinated Proceeding
20 No. 5108 pending in Alameda Superior Court, although the RCASF has not been served with all
21 of them yet. The Debtor has filed its Schedules and Statement of Financial Affairs identifying
22 each of the actions of which the Debtor was aware as of the initial schedules filing date of
23 September 21, 2023. *See* Dkts 152 and 153. The Debtor may become aware of other complaints
24 hereafter (such actions, together with any other civil action to which the Debtor is, or may become,
25 a party, collectively, the “Civil Actions”). By the Motion, the Debtor is requesting the Court to
26 enter an order pursuant to 28 U.S.C. § 1452 of title 11 of the United States Code and Bankruptcy
27 Rules 9027 and 9006 extending the deadline by which the Debtor may file notices of removal
28 under Bankruptcy Rule 9027(a) for the Civil Actions by 185 days from November 20, 2023, to

1 May 23, 2024, without prejudice to further extensions.

2 **NOTICE IS FURTHER GIVEN** that this notice does not contain all the particulars of the
3 Motion or supporting documents, nor does it summarize all of the evidence submitted in support.
4 For further specifics concerning the Motion and the relief requested, you are encouraged to review
5 the Motion and the supporting evidence, including the supporting Declarations, copies of which
6 may be obtained from the website to be maintained by the Debtor's proposed Claims and Noticing
7 Agent, Omni Agent Solutions, Inc., at <https://omniagentsolutions.com/RCASF>, free of charge. You
8 may also access these documents from the Court's Pacer system (requires a subscription). The web
9 page address for the United States Bankruptcy Court for the Northern District of California is
10 <http://www.canb.uscourts.gov>.

11 The Bankruptcy Court's website provides information regarding how to arrange a telephonic
12 or video appearance. Counsel, parties and other interested parties may attend the hearing in person
13 or by Zoom. Additional information is available on Judge Montali's Procedures page on the court's
14 website. Information on attending the hearing by Zoom will be provided on Judge Montali's
15 calendar posted on the court's website. The link to the judge's electronic calendar is:
16 <https://www.canb.uscourts.gov/judge/montali/calendar>.

17 **NOTICE IS FURTHER GIVEN** that any opposition or response to the Motion must be
18 in writing, filed with the Bankruptcy Court, and served on the counsel for the Debtor at the above-
19 referenced addresses so as to be received by October 19, 2023. Any opposition or response must
20 be filed and served on the Limited Service List as provided in the Interim Order Approving Motion
21 to (1) Establish Notice Procedures, (2) File Confidential Information Under Seal, and (3)
22 Temporarily Suspend Deadline for Filing Proofs of Claim at Dkt 38. The updated Limited Service
23 List may be obtained from the Omni website listed above. Failure to file timely opposition and
24 appear at the hearing may constitute a waiver of your objections. Your rights may be affected. You
25 should read these papers carefully and discuss them with your attorney, if you have one in this

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1 bankruptcy case. If you do not have an attorney, you may wish to consult one.

2 Dated: October 5, 2023

FELDERSTEIN FITZGERALD WILLOUGHBY
PASCUZZI & RIOS LLP

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By: /s/ Paul J. Pascuzzi

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PAUL J. PASCUZZI

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THOMAS R. PHINNEY

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Attorneys for The Roman Catholic Archbishop of
San Francisco

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Dated: October 5, 2023

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By: Ori Katz

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ORI KATZ

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ALAN H. MARTIN

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Attorneys for The Roman Catholic Archbishop of
San Francisco

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